

**PROPOSAL 253 - 5 AAC 39.670. Bering Sea/Aleutian Islands Individual Fishing Quota (IFQ) Crab Fisheries Management Plan.** Allow a vessel participating in a rationalized crab fishery to rig, bait, and set pot gear for a new crab fishery prior to fully exiting the crab fishery for which the vessel is validly registered, as follows:

5 AAC 39.670(c)(3)(D) should be amended to read: “a vessel’s crab pot gear may not be deployed unless the vessel is actively participating in harvesting the species in the applicable area; **except that a vessel participating in a rationalized crab fishery may deploy crab pot gear for another rationalized target crab fishery if all of the following criteria are met: 1) while at sea, the vessel has notified ADF&G of its intent to switch target fishery within 48 hours of the final haul for the previous target fishery; 1) gear conversion and setting occurs only during the conclusion of the haul trip for the previously targeted species, prior to offload; 2) re-rigged and baited gear is hauled within 10 days after setting; and 3) hauling of re-rigged and baited gear does not occur prior to registering for the new target fishery.**”

**What is the issue you would like the board to address and why?** 5 AAC 39.670(c)(3)(D) is a component of the BSAI Individual Fishing Quota (IFQ) Crab Fisheries Management Plan. Under this regulation as it is currently written, a vessel’s crab pot gear may not be deployed unless that vessel is actively harvesting one of the rationalized crab species in the applicable registration area. As such, when a vessel is switching between target crab species, it is prevented from re-rigging, baiting, and setting its pot gear prior to delivery and registration for its next target species (pots not aboard the vessel and rigged for the species on board must be stored in the water unbaited and open), otherwise the vessel would be out of compliance for their target fishery. This regulation is extremely inefficient from a vessel operations standpoint as it requires vessel operators to waste time (i.e., increased crew hours spent tending empty gear) and money (i.e., increased fuel costs from tending empty gear) in storing and pulling open pots prior to their ability to re-rig, bait, and set those pots for their next target crab species. Further, the inefficiencies that result from this regulation provide no biological or conservation benefit to the rationalized crab stocks (i.e., protections for juvenile and female crab are maintained through pot gear specifications maintained in regulation).

At the time BSAI Crab Rationalization was implemented, it was important for ADF&G to accurately track fishing effort under this new management program. One way of initially achieving this was through strict vessel registration and gear deployment requirements for each target fishery. Experience now shows that the multitude of economic efficiencies and benefits achieved through Crab Rationalization are being diminished through continuation of this regulation without achieving any biological, conservation, or management benefits as a balance. The major cause of injuries aboard Bering Sea crab vessels occurs during the handling of pot gear. Regulations that result in extraneous gear interactions are in direct contrast to the multiple safety improvements achieved by this fleet through the Rationalization Program. Without adoption of the amended regulatory language as proposed below, vessel operators will be required to continue operating in an extremely inefficient manner and will be subject to unnecessary financial costs for no realized benefit to either the target crab stocks or management program. With the stipulations and conditions included in the proposed regulatory language, ADF&G will maintain their ability to effectively monitor and record fishing effort and catch data without a decrease in management effectiveness.

**PROPOSED BY:** Alaskan Bering Sea Crabbers

(HQ-F16-021)

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